

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LEXOS MEDIA IP, LLC,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Civil Action No. 2:22-CV-00169-JRG
(Lead Case)

LEXOS MEDIA IP, LLC,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

Civil Action No. 2:22-CV-00175-JRG
(Member Case)

LEXOS MEDIA IP, LLC,

Plaintiff,

v.

OFFICE DEPOT, LLC,

Defendant.

Civil Action No. 2:22-CV-00273-JRG
(Member Case)

**DECLARATION OF DANIEL T. SHVODIAN IN SUPPORT OF RESPONSE CLAIM
CONSTRUCTION BRIEF OF DEFENDANTS AMAZON.COM, INC., TARGET
CORPORATION, AND OFFICE DEPOT, LLC**

I, Daniel T. Shvodian, declare:

1. I am an attorney with the law firm of Perkins Coie LLP, counsel of record for Defendants Office Depot, LLC and Amazon.com, Inc. I submit this Declaration in support of the Response Claim Construction Brief of Defendants Amazon.com, Inc., Target Corporation, and Office Depot, LLC.

2. Attached as Exhibit A is a true and correct copy of U.S. Patent No. 5,995,102.

3. Attached as Exhibit B is a true and correct copy of U.S. Patent No. 6,118,449.

4. Attached as Exhibit C is a true and correct copy of U.S. Patent No. 7,975,241.

5. Attached as Exhibit D is a true and correct copy of the Decision on Petition in re Patent No. 7,975,241 issued by the US Patent and Trademark Office on July 17, 2023.

6. Attached as Exhibit E is a true and correct copy of Engelbart, Douglas et al., *A research center for augmenting human intellect*, Fall Joint Computer Conference (1968).

7. Attached as Exhibit F is a true and correct copy of an excerpt of King, Adrian, *Inside Windows 95*, Microsoft Press (1994).

8. Attached as Exhibit G is a true and correct copy of an excerpt of the Encyclopedia Macintosh (1990 ed.).

9. Attached as Exhibit H is a true and correct copy of an excerpt of *The Windows Interface Guidelines – A Guide for Designing Software*, Microsoft Corporation (February 13, 1995).

10. Attached as Exhibit I is a true and correct copy of Scheifler, Robert W., *The X Window System*, ACM Transactions on Graphics, Vol. 5, No. 2 (April 1986).

11. Attached as Exhibit J is a true and correct copy of U.S. Patent No. 5,754,176.

12. Attached as Exhibit K is a true and correct copy of U.S. Patent No. 5,937,417.

13. Attached as Exhibit L is a true and correct copy of U.S. Patent No. 6,437,800.

14. Attached as Exhibit M is a true and correct copy of an excerpt of the Dictionary of Computing (4th ed.).

15. Attached as Exhibit N is a true and correct copy of Defendants' Disclosure of Preliminary Claim Constructions and Extrinsic Evidence in this case, dated April 18, 2023.

16. Attached as Exhibit O is a true and correct copy of a June 2, 2023 email from Defendants to Plaintiff.

17. Attached as Exhibit P is a true and correct copy of a June 5, 2023 email from Plaintiff to Defendants.

18. Attached as Exhibit Q is a true and correct copy of Plaintiff's P.R. 4-2 Disclosure of Preliminary Claim Constructions and Extrinsic Evidence in this case, dated April 18, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 28, 2023 at Palo Alto, California.

/s/ Daniel T. Shvodian
Daniel T. Shvodian

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served July 28, 2023, to all counsel of record, via the Court's CM/ECF system.

/s/ Daniel T. Shvodian

Daniel T. Shvodian